

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:
SHANNON LOUISE LEIB,
Debtor

Chapter 13
CASE NO 1:24-bk-00115-HWV

PNC BANK, NATIONAL ASSOCIATION,
Movant,

v.

SHANNON LOUISE LEIB,
Respondent

JACK N ZAHAROPOULOS, Trustee

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes the above-captioned Debtor, Shannon Leib, by and through her attorney, Dawn Cutaia, who files this Answer:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted that Debtor is behind; Denied as to the exact amount.
7. Denied as to amount.
8. Denied.
9. Denied.
10. Denied. Debtor can cure any arrears through an amended plan.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Motion for Relief from Stay and allow Debtors to cure the arrears through an amended plan.

Respectfully Submitted

/s/ Dawn Marie Cutaia
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